

# **Exhibit B**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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BILLY SHORT,	:	
	Plaintiff,	: 2:21-cv-02730-NIQA
v.	:	
QYST INC.,	:	
	Defendant.	:
		:

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**DECLARATION OF MARK J. GOTTESFELD**

I, Mark Gottesfeld, declare, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following facts are true and correct:

1. I am an attorney at Winebrake & Santillo, LLC (“W&S”) and am personally familiar with the firm’s involvement in this litigation.
2. I submit this declaration to provide the Court with information concerning the fee lodestar and litigation expenses incurred by W&S during the litigation.

**W&S’s Experience in the Field of Wage and Hour Litigation**

3. Since its founding in January 2007, W&S has exclusively represented plaintiffs in employment rights litigation. W&S is a pure contingency fee law firm and is “at risk” in every matter it handles. W&S never requires a client to pay an hourly fee or retainer. If a matter does not result in a money recovery, W&S recovers nothing. This is a very risky business. While W&S has enjoyed substantial success over the years, it also has invested thousands of dollars and attorney hours and on litigation adventures that have fallen flat and resulted in no recovery.

4. W&S lawyers have served as lead counsel in several appeals that have resulted in precedential opinions in the area of wage and hour law. *See Camara v. Mastro’s Restaurants, LLC*, 952 F.3d 372 (D.C. Cir. 2020); *Mazzarella v. Fast Rig Support, LLC*, 823 F.3d 786 (3d Cir. 2016); *Resch v. Krapf’s Coaches, Inc.*, 785 F.3d 869 (3d Cir. 2015); *McMaster v. Eastern Armored*

*Services*, 780 F.3d 167 (3d Cir. 2015); *Knepper v. Rite Aid Corp.*, 675 F.3d 249 (3d Cir. 2012); *Heimbach v. Amazon.com, Inc.*, \_\_ A.3d \_\_, 2021 WL 3059773, 2021 Pa. LEXIS 3047 (Pa. July 20, 2021). In other appeals resulting in precedential opinions, W&S has served as co-counsel, *see, e.g.*, *Bedoya v. American Eagle Express Inc.*, 914 F.3d 812 (3d Cir. 2019); *Parker v. NutriSystem, Inc.*, 620 F.3d 274 (3d Cir. 2010), or has authored *amicus curiae* briefs, *see, e.g.*, *Hargrove v. Sleepy's LLC*, 974 F.3d 467 (3d Cir. 2019); *Marzuq v. Cadete Enterprises, Inc.*, 807 F.3d 431 (1st Cir. 2015); *Chevalier v. General Nutrition Centers, Inc.*, 220 F.3d 1038 (Pa. 2019).<sup>1</sup>

5. At the trial court level, many of W&S's cases are class or collective actions seeking damages on behalf of groups of employees. To date, W&S has resolved 202 separate class/collective actions in courts throughout the United States. *See Exhibit 1.*

6. In addition, W&S has successfully resolved hundreds of "individual" employment rights actions in which a single plaintiff (or a small group of named plaintiffs) alleges violations of federal or state employment laws. In many of these cases, W&S severely discounts its attorney's fee in order facilitate settlement. In October 2016, W&S received the "Guardian Award" from Friends of Farmworkers in recognition of its work on behalf of low-wage workers in individual wage actions in and around Philadelphia.

#### **W&S Attorneys' Individual Experience**

7. **Pete Winebrake** ("Winebrake") graduated in 1988 from Lehigh University (*magna cum laude*) and in 1991 from Temple University School of Law (*cum laude*), where he served as a Managing Editor of the *Temple Law Review*. Winebrake has been a member of the New York bar since 1993 and the Pennsylvania bar since 1997. He also is admitted in the following federal courts: (i) the United States Supreme Court; (ii) the United States Courts of Appeals for the First,

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<sup>1</sup> W&S's considerable work on *amicus* briefs is exclusively done on a *pro bono* basis on behalf of worker's rights organizations.

Second, Third, Sixth, and Tenth Circuits; and (iii) the United States District Courts for the Eastern District of Pennsylvania, Middle District of Pennsylvania, Western District of Pennsylvania, Eastern District of New York, Northern District of New York, Southern District of New York, Western District of New York, Northern District of Ohio, Northern District of Illinois, District of Colorado, Southern District of Texas, and Eastern District of Michigan.

8. Prior to founding W&S in January 2007, Winebrake held the following positions: (i) Law Clerk to Justice William R. Johnson of the New Hampshire Supreme Court (9/91-8/92); (ii) Assistant Corporation Counsel at the New York City Law Department's General Litigation Unit (9/92-2/97); (iii) Associate at the Philadelphia law firm of Ballard Spahr Andrews & Ingersoll, LLP (2/97-12/98); (iv) Deputy City Solicitor and, later, Chief Deputy City Solicitor at the Philadelphia Law Department (12/98-2/02); and (v) Non-Equity Partner at the Philadelphia law firm of Trujillo Rodriguez & Richards, LLC (3/02-1/07).

9. Winebrake has personally handled hundreds of civil actions in the United States District Courts and has tried at least 15 federal cases to verdict. The great majority of these civil actions have arisen under the Nation's civil rights or employment rights laws.

10. Winebrake serves *pro bono* on the Mediation Panel of the United States District Court for the Middle District of Pennsylvania. The Martindale-Hubbell Peer Review Rating System gives him an "AV-Preeminent" rating. He has lectured on employment law at many organizations, including: Vanderbilt University School of Law; the Wharton School of Business at the University of Pennsylvania; the Beasley School of Law at Temple University; the University of Pennsylvania Law School; the Earle Mack School of Law at Drexel University; the Pennsylvania Bar Institute; the American Bar Association's Federal Labor Standards Legislation Committee; the Workplace Injury Law & Advocacy Group; the American Association of Justice; the National Employment Lawyers Association; the National Employment Lawyers Association of New York; the Ohio

Association of Justice; the Society for Human Resources Management; and the Lackawanna County (PA) Bar Association. Also, in June 2019, Winebrake testified regarding federal overtime standards at the United States House of Representatives' Subcommittee on Workforce Protections of the Committee on Education and Labor.

11. **Mark Gottesfeld** (“Gottesfeld”) graduated in 2006 from Lehigh University (*magna cum laude*) and in 2009 from Drexel University Earle Mack School of Law (*cum laude*), where he served as an editor on the *Drexel University Earle Mack School of Law Review*. During law school, Gottesfeld served as a Judicial Intern to Pennsylvania Superior Court Judge Jack A. Panella.

12. Gottesfeld has been a Member of the Pennsylvania and New Jersey bars since 2009 and a member of the New York bar since 2010. He also is admitted to the United States District Courts for the Eastern District of Pennsylvania, Middle District of Pennsylvania, Western District of Pennsylvania, District of New Jersey, and Eastern District of Michigan.

13. Prior to joining W&S in 2010, Gottesfeld worked at the Philadelphia firm of Saltz, Mongeluzzi, Barrett & Bendesky, P.C.

14. Gottesfeld has lectured on wage and hour issues at the National Employment Lawyers Association and the Ohio Association of Justice.

#### **W&S Attorneys’ Hourly Rates**

15. Because W&S works exclusively on a contingency fee basis, it does not send clients legal bills or charge them an hourly rate. However, W&S often submits hourly rates to federal and state courts in seeking the recovery of fees after either a plaintiff has prevailed under a fee-shifting statute or (as is more common) after a class or collective action lawsuit has been settled and the court must approve the requested attorney’s fee.

16. W&S has adopted the hourly rates described in the fee schedule published by Community Legal Services of Philadelphia. See <https://clsphila.org/about-community-legal->

services/attorney-fees/. We have adopted this approach because: (i) the CLS fee schedule has been favorably cited by the Third Circuit, *see United States ex rel. Palmer v. C&D Technologies, Inc.*, 897 F.3d 128, 138 (3d Cir. 2018); *Maldonado v. Houstoun*, 256 F.3d 181, 187-88 (3d Cir. 2001), and by district court judges overseeing cases handled by W&S;<sup>2</sup> (ii) the CLS rates are generally consistent with the rates awarded to W&S in Pennsylvania class action lawsuits in which the CLS rates have not been specifically referenced;<sup>3</sup> and (iii) in W&S's view, the CLS rates promote consistency, predictability, and efficiency in the evaluation of fee requests. Under the CLS schedule, the following rates apply: \$670/hr for Winebrake (1991 graduation) and \$375/hr for Gottesfeld (2009 graduation).

#### **Hours Spent by W&S and the Resulting Fee Lodestar**

17. W&S attorneys use the firm's case management system to contemporaneously record each case-related activity and the amount of time spent performing the activity in six minute increments.

18. W&S's work on this litigation is reflected in the contemporaneous time records attached at Exhibit 2. These records have been redacted to exclude the substance of attorney-client

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<sup>2</sup> See, e.g., *Sheridan v. Scranton Quincy Ambulance, LLC*, 2020 U.S. Dist. LEXIS 186032, \*3 (M.D. Pa. Oct. 7, 2020); *Mejia v. KVK-Tech, Inc.*, 2020 U.S. Dist. LEXIS 162235, \*4, 13 (E.D. Pa. Sept. 4, 2020); *Ogunlana v. Atlantic Diagnostic Laboratories LLC*, 2020 U.S. Dist. LEXIS 55619, \*11 (E.D. Pa. Mar. 31, 2020); *Hall v. Accolade, Inc.*, 2020 U.S. Dist. LEXIS 52632, \*31-32 (E.D. Pa. Mar. 25, 2020); *Shiptoski v. SMG Group, LLC*, 2020 U.S. Dist. LEXIS 8864, \*5 (M.D. Pa. Jan. 16, 2020); *Boa v. Novesa USA Inc.*, 2019 U.S. Dist. LEXIS 4112, \*3 (E.D. Pa. Jan. 4, 2019); *Kreamer v. Grant Production Testing Services, Inc.*, 2018 U.S. Dist. LEXIS 121417, \*3 (M.D. Pa. July 17, 2018); *Roxberry v. Snyders-Lance, Inc.*, 2017 U.S. Dist. LEXIS 193573, \*6 (M.D. Pa. Nov. 15, 2017); *DiClemente v. Adams Outdoor Advertising, Inc.*, 2016 U.S. Dist. LEXIS 88394, \*12-13 (M.D. Pa. July 8, 2016).

<sup>3</sup> See, e.g., *Whitfield v. Trinity Restaurant Group, LLC*, 2019 U.S. Dist. LEXIS 182055, \*11 (E.D. Mich. Oct. 3, 2019); *Kofsky v. Salerno*, 2018 U.S. Dist. LEXIS 169463, \*1 n. 3 (E.D. Pa. Sept. 25, 2018); *Tavares v. S-L Distribution Co., Inc.*, 2016 U.S. Dist. LEXIS 57689, \*53 (M.D. Pa. May 2, 2016); *Ford v. Lehigh Valley Restaurant Group, Inc.*, 2016 U.S. Dist. LEXIS 31732, \*3 n.2 (M.D. Pa. Mar. 10, 2016); *Young v. Tri County Sec. Agency, Inc.*, 13-cv-5371, 2014 U.S. Dist. LEXIS 62931, \*27 (E.D. Pa. May 7, 2014).

communications, the mental impressions of W&S attorneys, and the substance of settlement discussions protected under F.R.E. 408.<sup>4</sup>

19. As indicated in the time records, W&S has spent 33.2 hours and incurred a total fee lodestar of \$18,232.00:

NAME	TOTAL HOURS	HOURLY RATE	TOTAL
Peter Winebrake	19.6	\$670	\$13,132.00
Mark J. Gottesfeld	13.6	\$375	\$5,100
<b>TOTALS</b>	<b>33.2</b>		<b>\$18,232.00</b>

**W&S's Litigation Expenses**

20. To date, W&S incurred a total of \$472.50 in expenses in connection with this litigation. These expenses consist of the \$400 federal court filing fee and \$72.50 for service of process fee.

**I HEREBY DECLARE, UNDER PENALTY OF PERJURY AND PURSUANT TO 28 U.S.C. § 1746, THAT THE ABOVE FACTS ARE TRUE AND CORRECT:**



January 25, 2022

Date

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Mark J. Gottesfeld

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<sup>4</sup> Of course, un-redacted versions of the time records are available for the Court's *in camera* inspection.

# **Exhibit 1**

## Winebrake & Santillo, LLC - Class/Collective Wage and Overtime Settlements and Judgments

<u>Case Name</u>	<u>Court/Forum</u>	<u>Judge/Arbitrator</u>	<u>Date of Approval or Judgment</u>	<u>Type</u>	<u>Co-Counsel?</u>
Otto v. Pocono Medical Center, 4:06-cv-01186-JEJ	M.D. Pa.	John E. Jones, III	5/4/2007	Collective	No
Rodriguez-Fargas v. Hatfield Quality Meats, Inc., 2:06-cv-01206-LS	E.D. Pa.	Lawrence F. Stengel	5/29/2007	Class	Yes
Miller v. Antenna Star Satellites, Inc., 3:06-cv-00647-ARC	M.D. Pa.	A. Richard Caputo	5/29/2007	Collective	Yes
Sisko v. Wegmans Food Markets, Inc., 3:06-cv-00433-JMM	M.D. Pa.	James M. Munley	8/27/2007	Class	No
Evans/Smith, v. Lowe's Home Centers, Inc., 3:03-cv-00438/3:03-cv-00384-ARC	M.D. Pa.	A. Richard Caputo	9/4/2007	Collective	Yes
Diehl/Smith v. Lowe's Home Centers, Inc., 3:06-cv-01464/3:03-cv-00384-ARC	M.D. Pa.	A. Richard Caputo	1/4/2008	Class	Yes
Malec v. Kost Tire & Muffler, et al., 3:07-cv-00864-ARC	M.D. Pa.	A. Richard Caputo	1/2/2008	Collective	No
Dunn v. National Beef Packing Company, LLC, 4:07-cv-01599-JEJ	M.D. Pa.	John E. Jones, III	5/27/2008	Collective	No
Blasi v. United Financial Management Group, Inc., 3:06-cv-01519-JMM	M.D. Pa.	James M. Munley	6/19/2008	Collective	No
Palmer v. Michael Foods, Inc., 3:07-cv-02136-TIV	M.D. Pa.	Thomas I. Vanaskie	11/25/2008	Collective	No
Coluccio v. U.S. Remodelers, Inc., 1:09-cv-00819-JHR	D.N.J.	Joseph H. Rodriguez	12/15/2009	Collective	No
Shabazz v. Asurion Corporation, 3:07-cv-00653-AT	M.D. Tenn.	Aleta A. Trauger	2/26/2009	Collective	Yes
In re Cargill Meat Solutions Corp. Wage and Hour Litig., 3:06-cv-00513-WJN	M.D. Pa.	William J. Nealon	3/6/2009	Collective	Yes
Golpe v. The Wedge Medical Center, P.C., 2:08-cv-04504-JF	E.D. Pa.	John P. Fullam	3/11/2009	Collective	No
Banks, v. New Vitae, Inc. and Tri County Respite, Inc., 5:08-cv-04212-LS	E.D. Pa.	Lawrence F. Stengel	3/26/2009	Collective	No
Weatherly v. Michael Foods, Inc., 8:08-cv-00153-JFB	D. Neb.	Joseph F. Bataillon	4/15/2009	Collective	Yes
Gallagher v. Bayada Nurses, Inc., No. 071000392	Philadelphia C.C.P.	Idee C. Fox	4/21/2009	Class	No
Ray v. Krapf's Coaches, Inc., 2:08-cv-05097-DS	E.D. Pa.	David R. Strawbridge	9/10/2009	Collective	No
Miller v. Titanium Metals Corporation, 2:07-cv-04759-GP	E.D. Pa.	Gene E.K. Pratter	9/30/2009	Collective	No
Mayan v. Rydbom Express, Inc., 2:07-cv-02658-LS	E.D. Pa.	Lawrence F. Stengel	12/2/2009	Collective	No
Herd v. Specialty Surfaces International, Inc., 2:08-cv-01790-JCJ	E.D. Pa.	J. Curtis Joyner	1/26/2010	Collective	No
Morales v. Aaron Healthcare, Inc., 2008-C-5128	Lehigh C.C.P.	Brian Johnson	2/1/2010	Class	No
In re Pilgrim's Pride Fair Labor Standards Act Litig., 1:06-cv-01832-HFB	W.D. Ark.	Harry F. Barnes	4/2/2010	Collective	Yes
Williams v. Owens & Minor, Inc., 2:09-cv-00742-JD	E.D. Pa.	Jan E. Dubois	7/28/2010	Collective	No
Crisostomo v. Exclusive Detailing, Inc., 2:08-cv-01771-SRC-MAS	D.N.J.	Michael A. Shipp	9/15/2010	Collective	Yes
Gallagher v. Lackawanna County, 3:07-cv-00912-CCC	M.D. Pa.	Christopher C. Connor	10/5/2010	Collective	No
Herrarte v. Joe Jurglelewicz & Sons, Ltd., 5:09-cv-02683-RK	E.D. Pa.	Robert F. Kelly	10/27/2010	Collective	No
King v. Koch Foods of Mississippi, LLC, 3:06-cv-00301-DPJ	S.D. Miss.	Daniel P. Jordan	11/29/2010	Collective	Yes
McEvoy v. The Container Store, Inc., 1:09-cv-05490-KMW	D.N.J.	Karen M. Williams	12/17/2010	Collective	No
Hilborn v. Sanofi Pasteur, 3:09-cv-02032-ARC	M.D. Pa.	A. Richard Caputo	1/18/2011	Collective	No
Alexander/Campbell/Marrero v. KRA Corporation, 09-cv-02517/10-cv-01778/09-cv-02516-JF	E.D. Pa.	John P. Fullam	1/28/2011	Collective	Yes
Duvall v. Tri County Access Company, Inc., 2:10-cv-00118-RCM	W.D. Pa.	Robert C. Mitchell	3/30/2011	Class	No
Gibbons v. V.H. Cooper & Company, Inc., 3:10-cv-00897-JZ	N.D. Ohio	Jack Zouhary	4/18/2011	Class	Yes
Turner v. Mercy Health System, No. 080103670	Philadelphia C.C.P.	Idee C. Fox	4/20/2011	Class	Yes
Vanston v. Maxis Healthy System, No. 080605155	Philadelphia C.C.P.	Idee C. Fox	4/20/2011	Class	Yes
Dixon v. Dunmore Oil Company, 3:09-cv-00064-ARC	M.D. Pa.	A. Richard Caputo	4/27/2011	Collective	No
In re Tyson Foods, Inc., 4:06-cv-00143-CDL	M.D. Ga.	Clay D. Land	9/15/2011	Collective	Yes
Cover v. Feesers, Inc., 1:10-cv-00282-JEJ	M.D. Pa.	John E. Jones, III	10/11/2011	Collective	No
Muschultz v. Holcomb Behavioral Health Systems, 5:11-cv-02980-JKG	E.D. Pa.	James K. Gardner	12/15/2011	Collective	No
Johnson v. Krapf's Coaches, Inc., 2:11-cv-06974-BMS	E.D. Pa.	Berle M. Schiller	2/22/2012	Collective	No
McCray v. The Progressions Companies, Inc., 2:11-cv-07364-HB	E.D. Pa.	Harvey Bartle, III	3/2/2012	Collective	No
Slator v. Allscripts-Misys Healthcare Solutions, Inc., 1:10-cv-01069-GLS-RFT	N.D.N.Y	Gary L. Sharpe	4/4/2012	Collective	No
Smith v. Ameriplan Corporation, 4:10-cv-00075-ALM	E.D. Tx.	Amos L. Mazzant	8/9/2012	Collective	Yes
In re Creditron Financial Corp. (Lepkowski v. Creditron Financial Corp.), 08-11289-TPA	W.D. Pa. Bkr.	Thomas P. Agresti	8/31/2012	Collective	No
Fazio v. Automotive Training Center, 2:11-cv-06282-DS	E.D. Pa.	David R. Strawbridge	9/24/2012	Collective	No
Jean-Charles v. AAA Warman Home Care LLC, No. 110702236	Philadelphia C.C.P.	Mary Colins	9/28/2012	Class	No
Thomas v. Cescaphe Limited, LLC, 1:11-cv-04359-BMS	E.D. Pa.	Berle M. Schiller	10/3/2012	Class	No
Harkin v. LA Weight Loss, LLC, 2:12-cv-01411-AB	E.D. Pa.	Anita Brody	11/8/2012	Collective	No
Grajales v. Safe Haven Quality Care, LLC, 2010-cv-15102	Dauphin C.C.P.	Andrew H. Dowling	11/8/2012	Class	No
Grayson v. Register Tapes Unlimited, Inc., et al., 8:11-cv-00887-RWT	D. Md.	Roger W. Titus	11/26/2012	Collective	Yes

## Winebrake & Santillo, LLC - Class/Collective Wage and Overtime Settlements and Judgments

<u>Case Name</u>	<u>Court/Forum</u>	<u>Judge/Arbitrator</u>	<u>Date of Approval or Judgment</u>	<u>Type</u>	<u>Co-Counsel?</u>
Craig v. Rite Aid Corporation 4:08-cv-02317-JEJ	M.D. Pa.	John E. Jones, III	1/7/2013	Class	Yes
Knecht v. Penn Psychiatric Center, 2:12-cv-00988-CSMW	E.D. Pa.	Carol S. Moore Wells	3/6/2013	Collective	No
Thompson v. RGT Management, Inc., 2:11-cv-02573-AJT	W.D. Tenn.	Arthur J. Tarnow	3/21/2013	Collective	Yes
Kelsh v. First Niagara Financial Group, Inc., 2:12-cv-01202-PBT	E.D. Pa.	Petrese B. Tucker	4/8/2013	Class	No
Stewart v. World Communications Charter School, 2:12-cv-04993-RB	E.D. Pa.	Ronald L. Buckwalter	5/9/2013	Class	No
Edelen v. American Residential Services, LLC, 8:11-cv-2744-DKC	D. Md.	Deborah K. Chasnow	7/22/2013	Class	Yes
Ciarrocchi v. Neshaminy Electrical Contractors, Inc., 2:12-cv-06419-JHS	E.D. Pa.	Joel H. Slomsky	9/5/2013	Collective	No
LeClair v. Diakon Lutheran Social Ministries, Case No. 2010-C-5793	Lehigh C.C.P.	Michele A. Varricchio	8/14/2013	Class	Yes
Essame v. SSC Laurel Operating Company, LLC, 8:10-cv-03519-WGC	D. Md.	William G. Connelly	10/16/2013	Class	Yes
Ming v. SNL Enterprises, L.P., 5:11-cv-03873-RBS	E.D. Pa.	Barclay R. Surrick	11/29/2013	Collective	No
Bollelino v. Cellular Sales of Knoxville, Inc. 3:12-cv-00138-TC-HBG	E.D. Tenn.	Tena Campbell	11/29/2013	Collective	Yes
Wagner v. Cali, 5:12-cv-03226-JLS	E.D. Pa.	Jeffrey L. Schmehl	1/23/2014	Collective	No
Ginter/Robinson-Gibbs v. RBS Citizens, NA., 1:12-cv-00008-M-PAS/1:13-cv-00182-PAS	D.R.I.	John J. McConnell, Jr.	2/4/2014	Class	Yes
Glatts v. Crozer-Keystone Health System, No. 090401314	Philadelphia C.C.P.	Mark I. Bernstein	2/6/2014	Class	Yes
Galowitch v. Wells Fargo Bank, N.A., No. 130302298	Philadelphia C.C.P.	Mark I. Bernstein	3/5/2014	Class	No
Young v. Tri County Security Agency, Inc., 2:13-cv-05971-BMS	E.D. Pa.	Berle M. Schiller	5/7/2014	Class	No
Cuevas v. Citizens Financial Group, Inc., 1:10-cv-05582-RM	E.D.N.Y.	Robert M. Levy	5/7/2014	Class	Yes
Sakalas v. Wilkes-Barre Hospital Company, LLC, 3:11-cv-00546-RDM	M.D. Pa.	Robert D. Mariani	5/8/2014	Class	Yes
Kershner v. Hat World, Inc., No. 120803352	Philadelphia C.C.P.	Jacqueline F. Allen	5/29/2014	Class	No
Sacknoff v. Lehigh County, 5:13-cv-04203-EGS	E.D. Pa.	Edward G. Smith	7/18/2014	Collective	No
Oliver v. Abercrombie & Fitch Stores, Inc., No. 121102571	Philadelphia C.C.P.	Jacqueline F. Allen	7/21/2014	Class	No
Kiefer v. Moran Foods, Inc., 3:12-cv-00756-WGY	D. Conn.	William G. Young	7/31/2014	Class	Yes
Lynch v. Lawrenceburg NH Operations, LLC, 1:13-cv-00129-WJH	M.D. Tenn.	William J. Haynes	9/26/2014	Collective	Yes
Farley v. Family Dollar Stores, Inc., et al., 1:12-cv-00325-RPM	D. Colo.	Raymond P. Moore	10/30/2014	Class	Yes
Warcholak v. Payless ShoeSource, Inc., No. 130901010	Philadelphia C.C.P.	Idee C. Fox	10/30/2014	Class	Yes
Young v. Catherines, Inc., 2:13-cv-03288-CMR	E.D. Pa.	Cynthia M. Rufe	11/12/2014	Collective	Yes
Morrow v. County of Montgomery, 2:13-cv-01032-DS	E.D. Pa.	David R. Strawbridge	11/26/2014	Collective	Yes
Anderson v. The Scotts Company, LLC, No. 131100504	Philadelphia C.C.P.	Idee C. Fox	12/3/2014	Class	Yes
Eucedo v. Millwood, Inc., 3:12-cv-00895-MEM	M.D. Pa.	Malachy E. Mannion	12/9/2014	Class	Yes
Reid v. Newalta Environmental Services, Inc., 1:13-cv-03507-CMA-CBS	D. Colo.	Christine M. Arguello	2/19/2015	Collective	Yes
Stallard v. Fifth Third Bank, 2:12-cv-01092-MRH	W.D. Pa.	Mark R. Hornak	2/25/2015	Collective	Yes
Magloire v. The Ellison Nursing Group, LLC, No. 120203202	Philadelphia C.C.P.	Jacqueline F. Allen	3/12/2015	Class	No
Beal v. Claire's Stores, Inc., No. 131001989	Philadelphia C.C.P.	Idee C. Fox	3/18/2015	Class	Yes
Beck v. Bed Bath & Beyond Inc., No. 131100176	Philadelphia C.C.P.	Idee C. Fox	3/18/2015	Class	Yes
Jones v. Alliance Inspection Management, LLC, 2:13-cv-01662-NBF-CRE	W.D. Pa.	Nora Barry Fischer	3/23/2015	Collective	No
Menendez v. Precise Point, Inc., et al., No. 140300610	Philadelphia C.C.P.	Mary Collins	3/25/2015	Class	No
Calarco v. Healthcare Services Group, Inc., 3:13-cv-00688-RDM	M.D. Pa.	Robert D. Mariani	4/7/2015	Collective	No
Kelkis v. TruGreen Limited Partnership, No. 121101024	Philadelphia C.C.P.	Jacqueline F. Allen	5/14/2015	Class	Yes
Chung v. Wyndham Vacation Resorts, Inc., 3:14-cv-00490-RDM	M.D. Pa.	Robert D. Mariani	6/15/2015	Collective	No
McMaster v. Earstern Armored Services, Inc., 3:11-cv-05100-TJB	D.N.J.	Tonianne J. Bongiovanni	6/24/2015	Collective	No
Valinicus v. Express, Inc., No. 140702282	Philadelphia C.C.P.	Idee C. Fox	6/24/2015	Class	No
Hoelsworth v. New York & Company, Inc., No. 140403750	Philadelphia C.C.P.	Patricia A. McInerney	7/27/2015	Class	No
Puglisi v. TD Bank, N.A., 2:13-cv-00637-GRB	E.D.N.Y.	Gary R. Brown	7/30/2015	Class	Yes
Mazzarella v. Fast Rig Support, LLC et al, 3:13-cv-02844-MEM	M.D. Pa.	Malachy E. Mannion	7/31/2015	Collective	No
Lappas v. The Scotts Company, LLC, No. 140904450	Philadelphia C.C.P.	Idee C. Fox	8/5/2015	Class	Yes
Pew v. Finley Catering Co., Inc., 2:14-cv-04246	E.D. Pa.	Marilyn Heffley	8/10/2015	Collective	No
James v. Ann, Inc., et. al, No. 140903652	Philadelphia C.C.P.	Gary S. Glazer	8/17/2015	Class	No
Carroll v. Guardian Home Care Holdings, Inc., 3:14-cv-01722-WJH	M.D. Tenn.	William J. Haynes, Jr.	8/31/2015	Class	Yes
Morris v. M.D. Enterprises, et. al, 3:15-cv-00018-ARC	M.D. Pa.	A. Richard Caputo	10/5/2015	Class	No
Worthington v. Kymar Home Care, Inc. et al., No. 141203411	Philadelphia C.C.P.	Gary S. Glazer	10/9/2015	Class	No
Acevedo v. Moon Site Management, Inc., 2:13-cv-06810	E.D. Pa.	Timothy R. Rice	10/15/2015	Class	Yes

## Winebrake & Santillo, LLC - Class/Collective Wage and Overtime Settlements and Judgments

<u>Case Name</u>	<u>Court/Forum</u>	<u>Judge/Arbitrator</u>	<u>Date of Approval or Judgment</u>	<u>Type</u>	<u>Co-Counsel?</u>
Neal v. Air Drilling Associates, Inc., 3:14-cv-01104-JMM	M.D. Pa.	James M. Munley	12/8/2015	Collective	No
Ross v. Baha Petroleum Consulting Corp., 4:14-cv-00147-DLH-CSM	D.N.D.	Daniel L. Hovland	1/8/2016	Collective	Yes
Pacheco v. Vantage Foods, Inc., 1:14-cv-01127-CCC	M.D. Pa.	Christopher C. Connor	2/11/2016	Class	Yes
Ford et al v. Lehigh Valley Restaurant Group, Inc., 3:14-cv-00227-JMM	M.D. Pa.	James M. Munley	3/11/2016	Class	No
LaPan v. Dick's Sporting Goods, Inc., 1:13-cv-11390-RGS	D. Mass.	Richard G. Stearns	3/25/2016	Class	Yes
Stanek v. Keane Frac NC, LLC, 3:15-cv-01005-RDM	M.D. Pa.	Robert D. Mariani	3/25/2016	Class	No
Harrison v. Flint Energy Services, Inc., 4:15-cv-00962-MWB	M.D. Pa.	Matthew W. Brann	4/15/2016	Collective	No
Tavares v. S-L Distribution Co., Inc., 1:13-cv-01313-JEJ	M.D. Pa.	John E. Jones, III	5/2/2016	Class	Yes
Eld v. TForce Energy Services, Inc., Inc., 2:15-cv-00738-CB	W.D. Pa.	Cathy Bissoon	5/17/2016	Collective	No
Metzler, et al. v. Weis Markets, Inc., CV-15-2103	Northumberland C.C.P.	Charles H. Saylor	6/6/2016	Class	Yes
Alvarez, et al. v. KWLT, LLC, 5:14-cv-07075-JFL		Joseph F. Leeson	6/9/2016	Collective	Yes
Hughes v. ACHIEVA Support, GD-15-003562		R. Stanton Wettick, Jr.	7/7/2016	Class	No
DiClemente v. Adams Outdoor Advertising, Inc., 3:15-cv-00596-MEM		Malachy E. Mannion	7/8/2016	Collective	No
Johnson v. Kestrel Engineering, Inc., 2:15-cv-02575-EAS-EPD		Edmund A. Sargus, Jr.	9/22/2016	Collective	Yes
Iwaskow v. JLJJ, Inc., 3:15-cv-01934-ARC		A. Richard Caputo	9/28/2016	Collective	No
Fischer et al. v. Kmart Corporation, 3:13-cv-04116-DEA		Douglas E. Arpert	11/2/2016	Class	Yes
Cikra et al v. Lami Products, LLC, 2:15-cv-06166-WB		Wendy Beetlestone	11/10/2016	Class	Yes
Schaub v. Chesapeake & Delaware Brewing Company, LLC, 2:16-cv-00756-MAK		Mark A. Kearney	11/14/2016	Class	No
Wajert v. Infocision Management Corporation, 2:15-cv-01325-DSC		David S. Cercone	12/1/2016	Collective	No
DeLair v. CareAll Management, LLC, 3:15-cv-01095-AAT	M.D. Tenn.	Aleta A. Trauger	12/14/2016	Collective	Yes
Waggoner v. U.S. Bancorp, 5:14-cv-01626-SL	N.D. Ohio	Sara Lioi	12/26/2016	Collective	Yes
Loveland-Bowe v. National Healthcare Corporation, 3:15-cv-01084-WDC	M.D. Tenn.	Waverly D. Crenshaw, Jr.	1/5/2017	Collective	Yes
Paine v. Intrepid U.S.A., Inc., 3:14-cv-02005-WDC	M.D. Tenn.	Waverly D. Crenshaw, Jr.	1/6/2017	Collective	Yes
Flatt v. LHC Group, Inc. et al, 2:16-cv-00014-KHS	M.D. Tenn.	Kevin H. Sharp	3/1/2017	Collective	Yes
Smith et al v. Miller Flooring Company, Inc., 2:16-cv-00330-LAS	E.D. Pa.	Lynne A. Sitarski	3/13/2017	Collective	No
Crevatas v. Smith Management and Consulting, LLC, 3:15-cv-02307-MEM	M.D. Pa.	Malachy E. Mannion	3/22/2017	Collective	Yes
Hodzic v. FedEx Package System, Inc., 2:15-cv-00956-NBF	W.D. Pa.	Nora Barry Fischer	3/28/2017	Collective	Yes
Kelly v. FedEx Ground Package System, Inc., 3:08-cv-00336-RLM	N.D. Ind.	Robert L. Miller	4/28/2017	Class	Yes
Brackley v. Red Robin Gourmet Burgers, Inc., 2:16-cv-00288-GRB	E.D.N.Y.	Gary R. Brown	6/6/2017	Class	Yes
Kampfer v. Fifth Third Bank et al, 3:14-cv-02849-JJH	N.D. Ohio	Jeffrey J. Helmick	6/15/2017	Collective	Yes
Gauger v. Brothers, Inc., 2:16-cv-00603-DS	E.D. Pa.	David R. Strawbridge	6/19/2017	Collective	No
Simpson, et al. v. CareSouth HHA Holdings, LLC , 3:16-cv-00079-AAT	M.D. Tenn.	Aleta A. Trauger	6/22/2017	Collective	Yes
Sowder v. CareSouth HHA Holdings, LLC, 3:16-cv-00906-AAT	M.D. Tenn.	Aleta A. Trauger	6/22/2017	Collective	Yes
Waltz v. Aveda Transportation and Energy Services, Inc., 4:16-cv-00469-MWB	M.D. Pa.	Matthew W. Brann	7/7/2017	Collective	No
Bland v. Harvest Chadds Ford, LLC, 2:16-cv-04773-NIQA	E.D. Pa.	Nitza I. Quinones Alejandro	8/9/2017	Collective	No
Derrick v. Cenergy International Services, LLC, et al., 4:16-cv-1352	S.D. Tex.	David Hittner	8/9/2017	Collective	Yes
Bankalter v. S-L Distribution Company, Inc., 2017-SU-000549	York C.C.P.	Richard K. Renn	8/23/2017	Class	Yes
Kuhn v. Branch Banking & Trust Corporation, No. 160500229	Philadelphia C.C.P.	Nina Wright Padilla	9/8/2017	Class	No
Breauchy v. CareGivers America, LLC, 16-cv-3638		Margaret Bisignani Moyle	9/14/2017	Class	Yes
Molina v. Perfection Foods Company, Inc., et al, 2:16-cv-00859-JPH	E.D. Pa.	Jacob P. Hart	10/23/2017	Collective	Yes
Peters v. Zahav, LLC, 2:16-cv-06637-TR	E.D. Pa.	Timothy R. Rice	10/24/2017	Class	No
Roxberry et al v. Snyders-Lance, Inc. et al., 1:16-cv-02009-JEJ	M.D. Pa.	John E. Jones, III	11/15/2017	Class	Yes
Corbin v. CFRA, LLC, 1:15-cv-00405-CCE-JEP	M.D.N.C.	Catherine C. Eagles	2/5/2018	Collective	Yes
Sexton v. JDK Management Company, L.P., et al, 1:16-cv-01594-JEJ	M.D. Pa.	John E. Jones, III	2/5/2018	Collective	No
Wolfe v. TCC Wireless, LLC, 1:16-cv-11663	N.D Ill.	Maria Valdez	3/12/2018	Class	Yes
Santos v. El Gallito Mexican Bakery II LLC, et al., 5:16-cv-06309-EGS	E.D. Pa.	Edward G. Smith	3/12/2018	Collective	Yes
Trevorah v. Linde Corporation, 3:16-cv-00492-JMM	M.D. Pa.	James M. Munley	4/13/2018	Collective	Yes
Persing v. Ideal Concepts Inc., 5:16-cv-03825-JLS	E.D. Pa.	Jeffrey L. Schmehl	7/17/2018	Collective	No
Kramer v. Grant Production Testing Services Inc., 4:15-cv-01075-MWB	M.D. Pa.	Matthew W. Brann	7/17/2018	Class	Yes
Underwood v. Harvest Moorestown LLC, 1:17-cv-00550-JS	D.N.J.	Joel Schneider	7/24/2018	Collective	No
Broach v. CK Franchising, Inc., et al., AAA No. 01-16-0000-2234	American Arbitration Association	Edith Dinneen	8/14/2018	Class	Yes

## Winebrake & Santillo, LLC - Class/Collective Wage and Overtime Settlements and Judgments

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Teixeira v. Walters & Mason Retail, Inc., 2:18-cv-00717-RK	E.D. Pa.	Robert F. Kelly	9/6/2018	Collective	No
Carpenter v. Allpoints Courier Service, Inc., 1:17-cv-02043-JBS-AMD	D.N.J.	Jerome B. Simandle	9/11/2018	Collective	No
Bowden v. GHHS Healthcare LLC, 7:17-cv-00143-HL	M.D. Ga.	Hugh Lawson	9/27/2018	Collective	Yes
Cook v. Sunny Days in Home Care LLC, 2015-7144	Washington C.C.P.	Michael J. Lucas	10/11/2018	Class	Yes
Wojtaszek v. Bald Eagle Fuel & Tire, Inc., 4:17-cv-01888-RDM	M.D. Pa.	Robert D. Mariani	11/28/2018	Collective	No
Underwood, et al. v. KMC Enterprises, Inc., AAA Case No. 01-17-0003-9334	American Arbitration Association	Richard C. McNeill	5/1/2019	Collective	No
Dembele v. Parc Restaurant Partners, L.P., No. 171200223	Philadelphia C.C.P.	Ramy I. Djerassi	6/26/2019	Class	No
Behrens v. MLB Advanced Media, L.P., 1:18-cv-03077-PAE	S.D.N.Y.	Paul A. Engelmayer	7/9/2019	Class	Yes
Breuchy v. Alma Health, LLC, 2015-CV-01366	Dauphin C.C.P.	Andrew H. Dowling	7/22/2019	Class	No
Smith-Centz v. Safran Turney Hospitality, 2:18-cv-04055-CFK	E.D. Pa.	Chad F. Kenney	7/23/2019	Class	No
Mojer v. Americare Home Solutions LLC, 3:18-cv-00470-ARC	M.D. Pa.	A. Richard Caputo	8/12/2019	Collective	No
Passe v. 500 Jansen, Inc. et al., CV-2016-010362-BCD	Delaware C.C.P.	Barry C. Dozor	8/14/2019	Class	Yes
Hackman v. J.G. Wentworth Home Lending, LLC, No. 180401276	Philadelphia C.C.P.	Gary S. Glazer	9/9/2019	Class	Yes
Whitfield v. Trinity Restaurant Group, LLC, 2:18-cv-10973-DML	E.D. Mich.	David M. Lawson	10/4/2019	Collective	Yes
VanOrden v. Lebanon Farms Disposal, Inc., 1:17-cv-01310-CCC	M.D. Pa.	Christopher C. Connor	10/18/2019	Class	No
Layer v. Trinity Health Corporation, 2:18-v-2358-TR	E.D. Pa.	Timothy R. Rice	10/18/2019	Class	No
Alward v. Marriott International, Inc., 1:18-cv-2337-PAG	N.D. Ohio	Patricia A. Gaughan	11/18/2019	Class	Yes
Morris v. Public Health Management Corp., et al., 2:17-cv-04620-AB	E.D. Pa.	Anita Brody	11/19/2019	Collective	No
Padovano v. FedEx Ground Package System, Inc., 16-cv-00017-FPG	W.D.N.Y.	Frank P. Geradi	11/25/2019	Class	Yes
Shiptoski v. SMG Group, LLC, 16-cv-1216-RDM	M.D. Pa.	Robert D. Mariani	1/16/2020	Class	No
Rodriguez v. Joseph P. Riley & Sons Moving, Inc., No. 190200198	Philadelphia C.C.P.	Gary S. Glazer	2/11/2020	Class	No
Bell v. CoWorx Staffing Services, LLC, et al., 5:18-cv-02833-EGS	E.D. Pa.	Edward G. Smith	2/11/2020	Class	Yes
Maples v. Premier Care & Staffing Services, Inc., 2:19-cv-04209-MAK	E.D. Pa.	Mark A. Kearney	2/26/2020	Collective	No
Hall v. Accolade, Inc., 2:17-cv-03423-GEKP	E.D. Pa.	Gene E.K. Pratter	3/25/2020	Class	Yes
In re Aramark Bonus Litigation, 2:19-cv-00687-JP	E.D. Pa.	John R. Padova	6/10/2020	Class	Yes
Knapp v. Susquehanna Village Facility Operations, LLC, 3:18-cv-01941-RDM	M.D. Pa.	Robert D. Mariani	6/18/2020	Class	No
Travis v. Asociacion Puertorriquenos en Marcha, Inc., 2:18-cv-05015-GJP	E.D. Pa.	Gerald J. Pappert	7/20/2020	Collective	No
Meijia v. KVK-Tech, Inc., 2:19-cv-04841-JDW	E.D. Pa.	Joshua D. Wolson	9/4/2020	Collective	Yes
Nunez v. Moses Construction, Inc., et al., No. 180800610	Philadelphia C.C.P.	Ramy I. Djerassi	9/24/2020	Class	Yes
Carr v. Flowers Foods, Inc., et al., 15-cv-06391-WB	E.D. Pa.	Wendy Beetlestone	9/29/2020	Class	Yes
Sheridan v. Scranton Quincy Ambulance, LLC, 3:19-cv-00479-MCC	M.D. Pa.	Martin C. Carlson	10/7/2020	Collective	No
Zapata v. B. Coleman Flooring Installation, LLC et al., 1:18-cv-01134-TJK	D.D.C.	Timothy J. Kelly	10/21/2020	Collective	Yes
Shaw v. Tabor Community Partners, 2:19-cv-01620-JMY	E.D. Pa.	John Milton Younge	12/2/2020	Collective	No
Sicklesmith v. Hershey Entertainment & Resorts Company, 1:19-cv-01675-JEJ	M.D. Pa.	John E. Jones, III	12/30/2020	Collective	No
Lucas v. Heartfelt Home Healthcare, Inc., 1:20-cv-00029-WSH	W.D. Pa.	W. Scott Hardy	2/3/2021	Collective	No
Rivera v. Martin's Famous Pastry Shoppe, Inc., 1:20-cv-00438-JPW	M.D. Pa.	Jennifer P. Wilson	2/16/2021	Class	Yes
Camara v. Mastro's Restaurants LLC, 1:18-cv-00724-GMH	D.D.C.	G. Michael Harvey	6/23/2021	Collective	Yes
Simard v. Alan Kunsman Roofing and Siding Inc., 5:20-cv-3366-EGS	E.D. Pa.	Edward G. Smith	6/28/2021	Collective	No
Brown v. Lyndon City Diner, Inc., 1:19-cv-1227-JEJ	M.D. Pa.	John E. Jones, III	7/26/2021	Collective	No
Contrera v. E&M Associates LLC, 1:16-cv-3851-LTS	S.D.N.Y.	Gabriel W. Gorenstein	7/28/2021	Class	Yes
Johnson v. Blackout Investigations & Security Services, Inc., 8:19-cv-02487-TJS	D. Md.	Timothy J. Sullivan	9/3/2021	Collective	Yes
Lancaster, et al v. FQSR LLC, 8:19-cv-02632-TJS	D. Md.	Timothy J. Sullivan	9/13/2021	Collective	Yes
Gofton v. Kforce Inc., 2:20-cv-4886-TR	E.D. Pa.	Timothy R. Rice	9/30/2021	Class	Yes
Devine v. NorthEast Treatment Centers, Inc., 2:20-cv-2417-ER	E.D. Pa.	Eduardo C. Robreno	10/14/2021	Collective	No
Chaparro v. All American Home Care, LLC, No. 190900728	Philadelphia C.C.P.	Leon W. Tucker	10/27/2021	Class	Yes
Del Valle v. Empire Home Health Care Inc., 2:20-cv-4335-CMR	E.D. Pa.	Cynthia M. Rufe	11/8/2021	Class	No
Mode v. S-L Distribution Company, 3:18-cv-150-KDB-DSC	W.D.N.C.	Kenneth D. Bell	11/12/2021	Collective	Yes
Anderson/Williams v. Liberty Healthcare Corp., 2:20-cv-3014/21-cv-691-RAL	E.D. Pa.	Richard A. Lloret	11/22/2021	Collective	No
Breslin v. MPW Industrial Water Services, Inc., 3:21-cv-00582-MCC	M.D. Pa.	Martin C. Carlson	1/6/2022	Collective	No
Houser v. Thirty, Inc., 5:20-cv-05087-JFL	E.D. Pa.	Joseph F. Leeson	1/11/2022	Collective	No

# **Exhibit 2**

**Winebrake & Santillo, LLC Time Detail Report**  
**Billy Short v. Qyst Inc., 2:21-cv-02730-NIQA (E.D. Pa.)**

Attorney	Date	Task	Detail	Time
Winebrake	5/4/2020	Incoming Correspondence	EMAIL FR REF CSL W/ INTAKE INFO. (.1)	0.1
Winebrake	5/6/2020	Phone Call	REV OF REGS AND PC W/ CLT AND [REDACTED] (.15)	1.5
Winebrake	5/8/2020	Outgoing Correspondence	EMAIL EXCH W/ CLT AND REF CSL RE STATUS AND [REDACTED] (.1)	0.1
Winebrake	5/14/2020	Administrative	SAVE DOCS FR CLT AND EMAIL PROPOSING MTG NEXT WEEK. (.1)	0.1
			PC W/ CLT AND [REDACTED]	
Winebrake	5/19/2020	Phone Call	[REDACTED] (.3)	0.3
Winebrake	5/19/2020	Outgoing Correspondence	EMAIL TO CLT AND REF CSL CONFIRMING [REDACTED] (.1)	0.1
Winebrake	7/15/2020	Phone Call	CALL CLT AND LV VM STATING THAT [REDACTED] (.1)	0.1
Winebrake	7/16/2020	Phone Call	PC W/ CLT AND [REDACTED] (.1)	0.1
Winebrake	8/6/2020	Outgoing Correspondence	EMAIL TO REF CSL RE STATUS. (.1)	0.1
Winebrake	8/18/2020	Outgoing Correspondence	STATUS REPORT TO REF CSL. (.1)	0.1
Winebrake	9/21/2020	Phone Call	PC W/ CLT AND [REDACTED] (.1)	0.1
Winebrake	9/21/2020	Outgoing Correspondence	EMAIL TO CLT AND REF CSL RE [REDACTED] (.1)	0.1
Winebrake	5/10/2021	Phone Call	PC W/ CLT AND [REDACTED] (.3)	0.3
Winebrake	5/12/2021	Legal Papers/Research	DRAFT AND SEND REP AGREEMENT TO CLT. (.2)	0.2
Winebrake	5/18/2021	Phone Call	PC W/ CLT AND HE IS RETURNING REP AGREEMENT. (.1)	0.1
Winebrake	6/17/2021	Legal Papers/Research	WORK ON COMPLAINT AND REV DOCS AS NECESSARY AND PC W/ CLT RTO CONFIRM VAR FACTS. (2.0)	2
Winebrake	6/18/2021	Legal Papers/Research	FINALIZE COMPLAINT AND PREPARE ALL EDPA FOMS AND FILE ALL. (.3)	1.3
Winebrake	6/28/2021	Legal Papers/Research	REV SUMONS FR CLERK AND SEND TO MJG FOR SERVICE AND UPDATE CMS TO ADD JUSGE. (.1)	0.1
Winebrake	7/6/2021	Phone Call	RETURN PC FR ATTY DEBRA TRUSCELLO [REDACTED]	0.1
Winebrake	7/29/2021	Legal Papers/Research	REV AND SAVE ORDER RE SEEKING DEFAULT AND CAL DLN. (.1)	0.1
Winebrake	7/29/2021	Outgoing Correspondence	EMAIL TO DEBRA (THE LAWYER WHO CALLED) TELLING HER ABOUT THE "DEFAULT" ORDER; THEN SHE CALLS AND I TELL HER SAME BUT SHE SAYS SHE IS NOT REPRESENTING DEF BUT SHE WILL FORWARD MY EMAIL TO THE COMPANY. (.3)	0.3
Winebrake	7/30/2021	Outgoing Correspondence	EMAIL EXCH W/ TEMPORARY DEF CSL AGREEING TO 20-DAY EXTENSION. (.1)	0.1
Winebrake	8/4/2021	Legal Papers/Research	REV LET AND STIP AND SIGN AND RETURN SAME; ENTER NEW DEF CSL INTO CMS. (.2)	0.2
Winebrake	8/9/2021	Legal Papers/Research	REV ORDER SETTING RESPONSIVE PLEADING DLN AND EMAIL CLT RE SAME. (.1)	0.1
Winebrake	8/22/2021	Legal Papers/Research	REV GOLDNER EOA AND ADD HIM TO THE CASE MND CHANGE HIS ADDRESS INFO IN CMS; REV BONEBREAK W/D AND CHANGE CMS.. (.1)	0.1
Winebrake	8/22/2021	Legal Papers/Research	REV ANSWER AND AFF DEFENSES. (.2)	0.2
Winebrake	9/10/2021	Outgoing Correspondence	EMAILS TO CLT AND REF CSL RE STATUS. (.1)	0.1
Winebrake	9/21/2021	Legal Papers/Research	REV CT ORDER RE VIDEO ARBS AND COMPLETE AND FILE CONSENT TO SAME. (.2)	0.2

Attorney	Date	Task	Detail	Time
Winebrake	9/28/2021	Phone Call	PC W/ DEF CSL AND AGREE THAT WE WILL MAKE A SETTLEMENT DEMAND. (.2)	0.2
Winebrake	10/5/2021	Phone Call	REV CT ORDERS RE ARB AND CALENDAR SAME AND EMAIL TO CLT RE SAME AND RE HIS AVAILABILITY TO DISCUSS DAMAGES. (.2)	0.2
Winebrake	10/8/2021	Phone Call	PC W/ CLT [REDACTED] AND RUN THROUGH DAMAGES ANALYSIS (SEE HAND NOTES) [REDACTED] (.7)	0.7
Winebrake	10/28/2021	Settlement	DRAFT REVISE FINALIZE AND SEND DETAILED EMAIL TO DEF CSL JUSTIFYING AND MAKING [REDACTED] SETTLEMENT DEMAND. (1.0)	1
Winebrake	10/28/2021	Outgoing Correspondence	EMAIL TO CLT RE THE SETTLEMENT DEMAND. (.2)	0.2
Winebrake	11/11/2021	Discovery	PRELIM REV OF DEF'S INITIAL DISCOVERY REQUESTS. (.3)	0.3
Winebrake	11/11/2021	Discovery	PREP AND SERVE AUTO DISCLOSURES AND INTERVIEW PLF RE SAME. (1.3)	1.3
Winebrake	11/11/2021	Discovery	DRAFT REVISE FINALIZE AND SERVE INITIAL DOCUMENT REQUESTS AND INTERROGS AND RI=ULE 30B6 DEPOSITION NOTICES; REV FILE AS NECESSARY; SERVE FINAL VERSIONS. (3.2)	3.2
Winebrake	11/12/2021	Phone Call	PC W/ DEF CSL RE THE DISCOVERY ISSUES AND ALSO AGREE THAT WILL DO ALL THE DEPOSITIONS ON 12/15 AND THAT I WILL MAKE A NEW DEMAND. (.3)	0.3
Winebrake	11/12/2021	Settlement	EMAIL TO TO DEF CSL DROPPING TO [REDACTED] IN RESPONSE TO THE [REDACTED] OFFER. (.1)	0.1
Winebrake	11/30/2021	Outgoing Correspondence	EMAIL EXCH W/ DEF CSL. (.1)	0.1
Winebrake	12/12/2021	Legal Papers/Research	REV AND ORGANIZE CLT EMAILS FOR PRODUCTION. (.6)	0.6
Winebrake	12/12/2021	Settlement	DROP TO [REDACTED] IN RESPONSE TO THE [REDACTED] OFFER [REDACTED] (.1)	0.1
Winebrake	12/14/2021	Phone Call	PC W/ GOLDNER AND HE SAYS THAT THE BIG ARGUMENTS ARE [REDACTED] (.3)	0.3
Winebrake	12/14/2021	Phone Call	PC W/ CLT AND DISCUSS [REDACTED] (.3)	0.3
Winebrake	12/14/2021	Phone Call	PC W/ HAROLD AND TELL HIM [REDACTED] (.1)	0.1
Winebrake	12/14/2021	Outgoing Correspondence	EMAILS CONFIRM THAT SETTLED FOR \$25K. (.1)	0.1
Winebrake	12/16/2021	Outgoing Correspondence	EMAILS W/ DEF CSL RE CONFIDENTIALITY AND SCOPE OF RELEASE ISSUES; PULL MATERIALS TOGETHER FOR HIM. (.5)	0.5
Winebrake	12/18/2021	Legal Papers/Research	REV CT ORDERS. (.1)	0.1
Winebrake	12/27/2021	Phone Call	PC W/ DEF CSL AND EMPHASIZE THAT NEED TO LIMIT RELEASE AND CONFIDENTIALITY. (.2)	0.2
Winebrake	12/27/2021	Legal Papers/Research	REV DEF'S PROPOSED SETTLEMENT ASGREGEMNT AND EMAIL DEF CSL RE SAME. (.2)	0.2
Winebrake	12/29/2021	Legal Papers/Research	REV AND REDLINE DEF'S PROPOSED SETTLEMENT AGREEMENT; EMAIL SAME TO DEF CSL ALONG W/ W-9 FORM. (.5)	0.5
Winebrake	12/29/2021	Phone Call	PC W/ CLT AND [REDACTED] (.1)	0.1
Winebrake	1/3/2022	Legal Papers/Research	REV FINAL VERSION OF SETTLEMENT AGREEMENT AND EMAIL SAME TO CLT VIA DOCUSIGN; EMAIL EXCH W/ DEF CSL RE SAME; REV DEF LET TO CT RE SETTLEMENT. (.3)	0.3
Winebrake	1/4/2022	Legal Papers/Research	REV NOTICE RE CANCELLATION OF ARB AND MAKE VAR ADJUSTMENTS TO CMS. (.1)	0.1

<b>Attorney</b>	<b>Date</b>	<b>Task</b>	<b>Detail</b>	<b>Time</b>
Winebrake	1/10/2022	Outgoing Correspondence	REV AND SAVE EXECUTED SETTLEMNT AGREEMENT AND FORWARD SAME TO DEF CSL. (.1)	0.1
Winebrake	1/13/2022	Outgoing Correspondence	EMAIL TO CLT RE STATUS. (.1)	0.1
Gottesfeld	6/28/2021	Miscellaneous	COMPLETED SUMMONS AND ARRANGED FOR SERVICE OF PROCESS. (.2)	0.2
Gottesfeld	7/6/2021	Legal Papers/Research	DRAFTED AND FILED ENTRY OF APPEARANCE. (.1)	0.1
Gottesfeld	7/6/2021	Legal Papers/Research	REVIEWED AND FILED PROOF OF SERVICE FORM. (.1)	0.1
Gottesfeld	7/6/2021	Legal Papers/Research	REVIEWED ENTRY OF APPEARANCE AND PROOF OF SERVICE FORM AS DOCKETED. (.1)	0.1
Gottesfeld	8/23/2021	Legal Papers/Research	READ DEF'S ANSWER AND DEFENSES. (.2)	0.2
Gottesfeld	1/14/2022	Legal Papers/Research	STARTED WORKING ON MOTION AND BRIEF FOR APPROVAL OF SETTLEMENT. LEGAL RESEARCH AS NECESSARY. (7.1)	7.1
Gottesfeld	1/17/2022	Legal Papers/Research	FINISHED DRAFTING MOTION, BRIEF, AND PROPOSED ORDER FOR APPROVAL OF SETTLEMENT. ALSO DRAFTED AND FINALZIED DECLARATION. (5.8)	5.8

<b>Attorney</b>	<b>Hourly Rate</b>	<b>Hours</b>	<b>Lodestar</b>
Winebrake	\$670.00	19.6	\$13,132.00
Gottesfeld	\$375.00	13.6	\$5,100.00
<b>TOTAL:</b>		<b>33.2</b>	<b>\$18,232.00</b>